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April 13, 2020

VIA ECF FILING
Hon. P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York NY 10007

Application Granted.

So Ordered:

Hon. P. Kevin Castel, U.S.D.J.

4-15-20

Re: United States v. Grasso et al., 20-CR-00163 (PKC)

Dear Judge Castel:

The undersigned represents defendant Conor Flynn in the above referenced indictment. I write to respectfully request, pursuant to Fed. R. Crim P. 10(b), that the Court allow Mr. Flynn to waive his personal appearance of his April 21, 2020 arraignment and the initial conference. Attached as Exhibit A is a written waiver of appearance executed by Mr. Flynn. The Government has no objection to this request.

Mr. Flynn resides in upstate New York (Orange County). His attendance would require him to drive more than ninety (90) minutes from that location to New York City, and given the public health crisis in New York City relating to the COVID 19 pandemic, I respectfully request the Court grant Mr. Flynn's waiver of personal appearance.

As reflected in the written waiver of appearance, Mr. Flynn has received a copy of the above referenced indictment and I have reviewed it with him. Mr. Flynn enters a plea of "Not Guilty," to Count One.

Moreover, given the current national health emergency created by the COVID 19 Pandemic, I respectfully request to appear in this matter telephonically.

Respectfully submitted /s/
Andrew J. Mollica

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA, -against-	20 CR 163 (PKC)
Louis Grasso et al.,	
Defendants	×

WAIVER OF APPEAERENCE AT ARRAINGNMENT

I Conor Flynn declare and affirm as follows:

- 1. I am a defendant in the above captioned case and hereby waive my appearance at the arraignment and initial conference. I am aware the arraignment is scheduled for April 21, 2020 at 10:30 AM before the Honorable P. Kevin Castel in the Southern District of New York.
- 2. I have received a copy of the indictment in the above referenced case and have reviewed the indictment with my attorney Andrew J. Mollica

3. I plead not guilty to Count One of the Indictment.

4/10/2020 Date 1/10/2020

Date

Andrew J, Mollica

Conor Flynn

Counsel for Conor Flynn